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SEDIMENTS

Subject:  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Supplemental Remedial Investigations/Feasibility Studies  
Semi-Annual Progress Report (February 2008 – July 2008)

Date:  
August 15, 2008

Dear Jim:

Contact:  
Michael J. Erickson, P.E.

Attached is the third semi-annual progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigations/Feasibility Studies (SRI/FS). This progress report is submitted as per Section 7.2 of the Statement of Work (SOW) for the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864). Per Section 7.2 of the SOW, the semi-annual progress reports "shall address all areas of the Site where Respondents perform SRI/FS activities and shall summarize overall progress in completing the work required by the AOC and SOW."

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If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Michael J. Erickson, P.E.  
Associate Vice President

Attachment

Imagine the result

Copies:

Michael Berkoff, USEPA  
Sam Chummar, USEPA  
Michael Ribordy, USEPA  
Paul Bucholtz, MDEQ  
Jeff Keiser, CH2M HILL  
Todd Goeks, NOAA  
Jennifer Hale, Weyerhaeuser Company  
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**SEMI-ANNUAL PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
SRI/FS**

**REPORT #3, FEBRUARY 2008 TO JULY 2008**

**PREPARED BY ARCADIS  
ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)**

**SUBMITTED TO**

**JAMES SARIC, REMEDIAL PROJECT MANAGER  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site SRI/FS**

**REPORT #3, FEBRUARY 2008 TO JULY 2008**

**Areas of the Site where SRI/FS Activities Have Been Performed Pursuant to the AOC and SOW**

- Operable Unit 5 (OU 5) - Kalamazoo River from Morrow Dam to Lake Michigan and Portage Creek from Alcott Street to the confluence.

**Summary of Overall Progress in Completing Work Required by the AOC and SOW - Area 1 and Multi-Area**

**AOC Requirements**

- As discussed in Section 28b of the AOC, the United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ) were notified in advance of sample collection activities.
- The six monthly progress reports generated during the February 2008 to July 2008 period were submitted on time, as required by Section 37 of the AOC and Section 7.1 of the SOW.

**SOW Requirements**

**Task 1. Project Scoping and SRI/FS Planning Documents**

*Submittals approved by USEPA and finalized:*

- On June 4, USEPA approved the revised Data Management Plan (DMP), which was submitted to USEPA on April 28. The DMP is discussed in Section 1.3 of the SOW. On June 13, ARCADIS transmitted the final DMP to USEPA.
- On June 19, USEPA approved the May 2008 revised draft Risk Assessment Framework (RAF). The RAF is discussed in Section 1.2.1.5 of the SOW. On July 1, ARCADIS submitted the final RAF to USEPA.
- On May 7, USEPA approved the revised and expanded draft investigation plan for the Plainwell No. 2 Dam Area.
- On May 21, USEPA approved the Ecological Risk Studies Peer Review Scope of Work.

*Activities toward completion of other requirements:*

- During the period, ARCADIS and USEPA discussed the ecological risk assessment report peer review process. This process is discussed in Section 1.2.1.3 of the SOW. On May 5, ARCADIS

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**REPORT #3, FEBRUARY 2008 TO JULY 2008**

transmitted to USEPA the Peer Review Scope of Work and the Charge to the Peer Review Panel (Charge). On May 6, USEPA approved the Charge and ARCADIS submitted the Charge and Supporting Materials to the Peer Review Panel. On May 13 and 14, the Peer Review Panel met for delivery of the Charge and a site tour.

- On February 1, ARCADIS forwarded to USEPA Addendum 2 to the Multi-Area Health and Safety Plan.
- On April 2, USEPA held a public meeting in Plainwell. On March 31, ARCADIS forwarded to USEPA PowerPoint slides for use at the meeting.
- On April 11, ARCADIS transmitted the Area 1 SRI Phase 1 Data Report to USEPA and MDEQ. On July 15, USEPA and KRSG held a meeting in Chicago to discuss the Area 1 SRI status and planning. On July 8, ARCADIS forwarded to USEPA a draft agenda for the meeting as well as the Area 1 SRI components status table. On July 28, ARCADIS forwarded to USEPA, MDEQ and CH2M HILL the action item list from the July 15 meeting along with an electronic copy of the projected schedule and the Area 1 SRI components status table.

*Submittals awaiting completion:*

- On February 19, USEPA forwarded its comments on the draft Conceptual Site Model (CSM), which was submitted to USEPA on June 21, 2007. On March 3, ARCADIS received MDEQ's comments (dated February 22) on the draft CSM. On April 18, ARCADIS submitted the revised draft CSM to USEPA. The submission also included the responses to the comments received from USEPA and MDEQ. On July 2, USEPA provided comments on the revised draft CSM. The letter was received by ARCADIS on July 10. The CSM is discussed in Section 1.2.1.4 of the SOW.
- On February 22, ARCADIS submitted to USEPA the Preliminary Remedial Technology Screening (Section 1.2.2.1 of the SOW), the Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (Section 1.2.2.2. of the SOW), the Preliminary Permitting/Equivalency Requirements (Section 1.2.2.3 of the SOW), and the Candidate Technologies and Testing Needs Technical Memorandum (Section 4.1 of the SOW). On May 9, MDEQ forwarded to ARCADIS its comments on these documents.
- The KRSG awaits USEPA's response to a letter requesting USEPA's data usability determination for existing data for purposes of the SRI/FS, which was submitted to USEPA on August 27, 2007. Data usability is discussed in Section 1.1.2 of the SOW.
- The KRSG, USEPA and MDEQ discussed the disposal of historical archived sediment cores from Area 1. The KRSG awaits resolution of this issue.

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- The KRSG awaits USEPA's approval of the proposed SRI Phase 2 sampling plan for Portage Creek sediment core collection, which was submitted to USEPA on May 29. On June 17, ARCADIS received CH2M HILL's draft comments on this plan.
- The KRSG awaits USEPA's approval of the proposed Phase 2 sediment core analyses plan, which was submitted to USEPA on June 10.

**Task 2. Site Characterization**

- On February 1, ARCADIS received the analytical data for the top-of-bank soil cores collected along the mill race and the Kalamazoo River between the Plainwell No. 2 Dam and the confluence of the mill race and the river (sample delivery groups [SDGs] SRI005 and SRI006). These cores were collected in October and November 2007 as per Section 3.4.2.2 of the Area 1 SRI/FS Work Plan.
- On February 13 and 15, ARCADIS received the analytical data for the post-removal surface sediment samples from the 2007 Plainwell time critical removal action (TCRA) removal areas (SDGs SRI007 and SRI008). This work is discussed in Section 3.4.5 of the Area 1 SRI/FS Work Plan. These data were forwarded to USEPA on March 3.
- Beginning on March 26, ARCADIS collected water column samples every other day at the upstream and downstream locations related to the Former Plainwell Impoundment TCRA. This sampling is discussed in Section 3.4.5 of the Area 1 SRI/FS Work Plan.
- From April through July, ARCADIS received laboratory data for the surface water samples collected between March 27 and July 9 (SDGs TCRA32, TCRA33, TCRA35, TCRA37, TCRA39, TCRA41, TCRA43, TCRA44, TCRA46, TCRA48, TCRA50, TCRA52, TCRA55, TCRA56, TCRA58 and TCRA60).
- In June, ARCADIS probed sediment along 22 transects, collected and segmented floodplain grid cores, measured stream flow at three stream gauges, collected top-of-bank soil samples, and performed a bank profile survey in the Plainwell No. 2 Dam Area.
- On June 16, MDEQ forwarded to ARCADIS observations made regarding the Plainwell No. 2 Dam Area. On June 17, ARCADIS forwarded to USEPA, MDEQ and CH2M HILL sediment probing data related to the area. On June 25, CH2M HILL transmitted to ARCADIS a map of the areas where soft sediments were observed while probing between transects in the area. On June 25, ARCADIS forwarded to CH2M HILL proposed sample locations for the area. On July 23, ARCADIS forwarded to USEPA a letter that documents the proposed sediment core sample locations in the area.

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- In June and July, ARCADIS collected additional sediment cores in the Plainwell No. 2 Dam Area and placed those cores in the freezer in the Kalamazoo office. Starting July 21, ARCADIS segmented those cores for analysis.
- In June and July, ARCADIS received the laboratory data for the floodplain grid cores that were collected in the Plainwell No. 2 Dam Area (SDG SRI009 through SRI025 and SRI040).
- In July, ARCADIS began receiving the laboratory data for the top-of-bank soil samples that were collected in the Plainwell No. 2 Dam Area (SDG SRI026 through SRI033 and SRI035 through SRI037).
- During the week of July 7, ARCADIS performed a habitat assessment in the Plainwell No. 2 Dam Area.

Task 3. Remedial Investigation Report (including ecological and human health risk assessment)

- No meetings, submittals, or notifications.

Task 4. Treatability Studies (if needed)

- No meetings, submittals, or notifications.

Task 5. Development of Screening Alternatives (Technical Memorandum)

- No meetings, submittals, or notifications.

Task 6. Detailed Analysis of Alternatives (FS Report)

- No meetings, submittals, or notifications.

Task 7. Progress Reports

- The six monthly progress reports generated during the February 2008 to July 2008 period were submitted on time, as required by Section 7.1 of the SOW.
- The second semi-annual progress report for Area 1 was submitted to USEPA as required by Section 7.2 of the SOW.